

## ORAL AND VIDEOTAPED DEPOSITION OF THERESA ALLEN

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1 A No.  
 2 Q You don't think you would have said that?  
 3 A That we were a family and not numbers on a page.  
 4 Q That's right.  
 5 A I may have said that, but not to her.  
 6 Q Who do you think you would have said that to?  
 7 A I have no idea, but not to her. Because she  
 8 hasn't spoke to me but that time on the phone  
 9 when she came and told me I'd never see those  
 10 kids again.  
 11 Q And you're testifying she never spoke to you  
 12 other than the alleged conversation that you  
 13 allege?  
 14 A When she came in my home, squat down on my sofa,  
 15 told me because I went over her head and that I  
 16 would never see them kids again. That's what  
 17 she said. And I'm never -- I barely recognize  
 18 her because she look like she kind of thick,  
 19 gained a little weight.  
 20 Q You're saying it's -- that Yolanda Alpough said  
 21 that?  
 22 A I'm sorry?  
 23 Q So you're saying that Yolanda Alpough told you  
 24 you'd be sorry for going over her head?  
 25 A Stephanie told me December the --

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1 A "Yes" or "no" what -- yes, she told me that.  
 2 Q Your allegation is she told you that --  
 3 A Yes.  
 4 Q You would be sorry for --  
 5 A Yes.  
 6 Q -- going over her head.  
 7 THE WITNESS: Can you get that three  
 8 times?  
 9 A Yes.  
 10 Q (BY MR. SEAQUIST) Okay. Because in your  
 11 petition you allege that comment was made by  
 12 Stephanie Hammon, not Yolanda Alpough.  
 13 A Well, I don't know what happened, but I say on  
 14 December the 3rd, I received a phone call.  
 15 While I was on a conference call and I put Ms.  
 16 Stephanie Hammon on hold. By this time I did  
 17 not trust them. I asked Ms. Faye Guillory to  
 18 put her phone on mute and to witness the  
 19 conversation, because she was mad. She made it  
 20 obvious that she was upset that I went over her  
 21 head. I asked her to hold on just a moment and  
 22 I clicked over. And that's why I will try to  
 23 get my phone and perhaps they would show that  
 24 day, December 3rd.  
 25 Q Everything you have just said is an allegation

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1 Q Well, that's not what you just testified to.  
 2 You said my client, Yolanda Alpough, came to  
 3 your house and --  
 4 A When she came into my home.  
 5 Q -- told you that you'd be sorry for going over  
 6 her head.  
 7 A When she came in --  
 8 Q She never said that, did she?  
 9 A You want me to tell you?  
 10 Q I want a "yes" or "no" answer to that question.  
 11 MR. BRANSON: Well, let her answer  
 12 your first question.  
 13 A Which one you want?  
 14 Q (BY MR. SEAQUIST) She never said that. Yolanda  
 15 Alpough never said to you that you'd be sorry  
 16 for going over Yolanda Alpough's head?  
 17 A You're telling me that or you're asking?  
 18 Q I'm asking you that.  
 19 A Do you want me to tell you?  
 20 Q I want you to answer that question "yes" or  
 21 "no."  
 22 A Yolanda Alpough came inside my home --  
 23 Q Ma'am --  
 24 A December 4.  
 25 Q It is a "yes" or "no" question -- "yes" or "no"?

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1 that you are making against Stephanie Hammon,  
 2 not Yolanda Alpough.  
 3 A Which one do you want to know --  
 4 Q I have asked you --  
 5 A -- because they both said it on December 3rd.  
 6 Q I have asked you expressly --  
 7 A December the --  
 8 Q Yolanda Alpough?  
 9 A Okay. Yolanda Alpough told me that I would be  
 10 sorry for going over her head.  
 11 Q When did you go over her head, ma'am?  
 12 A When I called Ivy Chambers, because they were  
 13 not returning my phone calls.  
 14 Q Who else heard is a witness to this alleged  
 15 statement by Yolanda Alpough?  
 16 A I had my phone on mute -- I mean, when she came  
 17 to my door.  
 18 Q No, ma'am.  
 19 A Ms. Faye Guillory was on the phone the whole  
 20 time.  
 21 Q That was, again, your conversation with  
 22 Stephanie Hammon. I'm asking --  
 23 A With Yolanda Alpough.  
 24 Q Okay.  
 25 A When she knocked on my door and I went to my

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1 door and it was freezing and the kids were  
2 trying to see who was at the door. And when I  
3 moved the kids like this, she came in -- her and  
4 whoever she had with her. I put the lady's name  
5 in my notes. She walked in my home. She was  
6 fierce. She was angry and I was intimidated by  
7 her persona. And she came in and she -- you  
8 know. And I remember trying to get my  
9 grandbabies away from that tension.

10 MR. SEAQUIST: Objection.  
11 nonresponsive.

12 A Okay. Well, she came in my home --

13 Q My question is about this -- first, let me ask  
14 you this: When do you allege that Yolanda  
15 Although ever told you that you would be sorry  
16 for going over her head?

17 A December 4th, when she walked in my house and  
18 she walked over to my -- and I asked her, well,  
19 who is this. Because I didn't like the way she  
20 came in my house. She just -- because my  
21 grandbabies were in the way and I didn't like  
22 what she --

23 MR. SEAQUIST: Objection,  
24 nonresponsive.

25 Q (BY MR. SEAQUIST) I'm talking about the

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1 returning my phone calls. I'm just trying to  
2 comply -- she said, "uh-huh uh-huh. You're  
3 going to be sorry you went over my head. And  
4 she proceeded to tell me that someone would be  
5 at my house. And she hung up the phone.

6 Q Okay. So the only person who heard either of  
7 these statements is Faye Guillory.

8 A This is true.

9 Q And you say, at least -- you say on the first  
10 call, you somehow patched Ms. Guillory into the  
11 call.

12 A I'm saying --

13 Q No, that was Stephanie Hammon you say you  
14 patched Ms. Guillory into the call.

15 A On December 3rd, Ms. Faye Guillory -- when I  
16 received a phone call from Stephanie Hammon, it  
17 was so obvious that she was angry by the way she  
18 was. She say, you called my supervisor -- my  
19 program director. And then I said, ma'am, and I  
20 was trying and she was talking over me. And I  
21 said, Could you hold on one moment. I said,  
22 please, could you hold on one moment? And then  
23 I switched over to call Ms. Faye. And I said,  
24 Ms. Faye -- and I explained to her the  
25 situation. I was trying to find my recorder to

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1 statement --

2 A December 4th.

3 Q December 4th, all right. Who witnessed that  
4 statement?

5 A Faye Guillory.

6 Q And where was Faye Guillory?

7 A On the phone.

8 Q Okay.

9 A The whole time.

10 Q Okay. When did you get Faye Guillory on the  
11 phone?

12 A Before she came in.

13 Q Okay. You had Faye Guillory on the phone before  
14 anybody even showed up to your house?

15 A Yes.

16 Q All right.

17 A And I asked Pastor Jim McKinnon to come over as  
18 a witness as well. Because of the previous  
19 threat made the day before by Stephanie Hammon.

20 Q Okay. What threat was that, ma'am?

21 A That I would be sorry -- she said, "You went  
22 over my head. You're going to be sorry you went  
23 over my head." And I begged her with Faye  
24 Guillory on the phone. I said, "Ma'am, I didn't  
25 try to go over your head. You guys weren't

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1 put it on speaker and record. But I was  
2 trembling like this (demonstrating). And then  
3 she say, "Baby, take a deep breath." She said  
4 I'm going to put my phone on mute and I'm going  
5 to listen." She said, maybe you're panicking  
6 for nothing. So I clicked the phone over and  
7 she witnessed to the whole. She said, "Baby,  
8 that's a threat." She say that woman threatened  
9 you. So then that's why I had her on -- she was  
10 so --

11 Q Please stop pointing at my client.

12 A I'm sorry. Well, I'm sorry. I speak with my  
13 hand. But Yolanda Although -- can I say her  
14 name?

15 Q You may -- yes, you may.

16 A Was so indignant when she and abusive in her  
17 authority. She didn't even care about my  
18 grandbaby. She just bombarded my home with this  
19 attitude feeling. And I tried to be nice, but I  
20 was scared. I was scared because she was --  
21 looked like her mind was made up to take my  
22 grandbabies. And she plopped down on my sofa  
23 and she squat down like this and she grabs her  
24 phone. She didn't even realize I had the phone  
25 in my hand the whole time.

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1 Q Okay. So --  
 2 A When I sat down.  
 3 Q Ms. Guillory, your testimony is Ms. Guillory  
 4 overheard the interactions in the room on the  
 5 other end of the phone.  
 6 A Yes, she did.  
 7 Q Okay. All right.  
 8 A And to prove it, she spoke to the other lady  
 9 that was with her. She didn't tell me -- excuse  
 10 me. I'm just talking with my hands. I don't  
 11 mean any harm.  
 12 She spoke to the other lady that was with  
 13 Ms. Alrough. When I realized that Ms. Alrough  
 14 was -- mind was made up, that she was there to  
 15 take the children, no matter what I did, then I  
 16 tried to get on my cell phone to call Scott  
 17 Dixon who I'd spoken to and Ivy Chambers.  
 18 Because I didn't want -- my grandbabies, they  
 19 were innocent. They had never been exposed to  
 20 any of that. She went outside. Yolanda Alrough  
 21 went outside, Ms. Faye started speaking on the  
 22 phone to whoever she was with. And if it  
 23 wouldn't have been for that lady, whoever she  
 24 was, who appeared to be compassionate, she gave  
 25 me a form. And the only think Yolanda wanted me

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1 would get out. I would have to pick the kids up  
 2 from her, then to pick the kids up from daycare.  
 3 Q And at that point, she was no longer living at  
 4 the apartment over at 2000 Tidwell; is that  
 5 right?  
 6 A Yeah, wherever we was she was living there.  
 7 Yes, she was staying.  
 8 Q Not the apartment that she was in in August.  
 9 A I don't know. I just know that she was working  
 10 at whatever the name of the thing was and  
 11 whatever arrangements we had, I dropped the  
 12 children off and I picked them up and Ms. Faye  
 13 was always with us because I didn't know the  
 14 area. I was new to the area. And Ms. Faye, by  
 15 her being older, she loved being with us. You  
 16 know, that was like her outing. So she was  
 17 always with us with everything.  
 18 Q Ms. Allen, Ms. Renesha Allen, had been evicted  
 19 from that other apartment, correct?  
 20 A I don't know. When I found out that Renesha was  
 21 evicted from her apartment, it was just like any  
 22 other time. I don't even know where she went  
 23 after that, because I just didn't know. I went  
 24 over there to help her to try to clean up. But  
 25 I didn't clean up like I normally do.

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1 to sign something for her to pick up the  
 2 children. I told her, "I'm not -- with all due  
 3 respect, I'm not trying to upset you, but I'm  
 4 not signing anything. And I told her my  
 5 daughter was in rehab. My daughter placed the  
 6 kids with me. The kids weren't in any harm.  
 7 And I begged -- I was trying to buy time. Next  
 8 thing I knew, she went outside and the police  
 9 came in.  
 10 Q Okay. I want to back up. When did Renesha  
 11 bring the children to you in your -- when is it  
 12 your testimony that Renesha brought the children  
 13 to you when she wanted to go to rehab?  
 14 A Immediately. I mean, as soon as -- because it's  
 15 November, remember. It was November when I  
 16 received that call. The kids were already with  
 17 me. So she said "Mama, I'm going to make  
 18 preparation," she said, "and go get some help."  
 19 Q Okay. And then you were driving the kids back  
 20 and forth at that time, correct?  
 21 A No. Sometime the children would be with her.  
 22 Remember I told you she had a split shift for  
 23 the daycare. And something happened to where  
 24 the kids couldn't go all day. Because of -- I  
 25 don't know what it was. So sometime, when she

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1 Q And she testified yesterday that she got a new  
 2 apartment and she took the kids there; isn't  
 3 that right?  
 4 A Oh, I don't know nothing about that.  
 5 Q Okay. And you never went and dropped the kid  
 6 off at her new apartment or her new house.  
 7 A I don't even remember any new house. I've  
 8 never, ever, ever, ever, ever, been out, after  
 9 she moved from Tidwell, I don't know where she  
 10 went. Never.  
 11 Q All right. And it's your testimony you did not  
 12 know that Renesha Allen was asked to take a drug  
 13 test?  
 14 A I didn't know anything about what CPS did. The  
 15 first time I, again, heard from CPS is when  
 16 Yolanda Alrough called me and told me what I  
 17 told you earlier. No one from CPS tried to talk  
 18 to me about anything.  
 19 Q And is it your testimony that on December 3rd,  
 20 one of the other things you allege Ms. Hammon  
 21 told you, she told you that Yolanda Alrough was  
 22 going to be coming out to your house on December  
 23 the 4th.  
 24 A She didn't tell me who. She just said somebody  
 25 was going to be coming out there and then she

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1 hung up.  
 2 Q Okay.  
 3 A I was trying to -- I was begging her and I was  
 4 asking her, you know, just was begging her, you  
 5 know. But that's what she was saying. And then  
 6 Ms. Faye told me, she said, "That woman  
 7 threatened you. She threatened you. She, you  
 8 know, she was just telling me that I shouldn't  
 9 have went over her head and she's going to show  
 10 what happened to people that go over her head.  
 11 And I said, "Well, I didn't know what to do." I  
 12 said, "I called you. What was I supposed to  
 13 do," you know. And she just kept saying that I  
 14 went over her head and I was going to be sorry I  
 15 went over her head.  
 16 Q Okay. Ms. Guillory --  
 17 A Same thing she said.  
 18 Q Ms. Guillory is the only other person who heard  
 19 that?  
 20 A Yep.  
 21 Q And nobody else?  
 22 A I mean, I can't keep a security guard --  
 23 Q Nobody else heard Yolanda Alpough say anything?  
 24 A Nope.  
 25 Q Do you know that Ms. Alpough also has a

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1 A I was told that someone would be coming to my  
 2 home.  
 3 Q And you were given the time they would be there  
 4 approximately?  
 5 A Yes, sir.  
 6 Q So you were expecting them?  
 7 A Yes.  
 8 Q So you weren't surprised when they knocked on  
 9 the door?  
 10 A No, but I was surprised when she bombard --  
 11 well, put her foot in my door and I was offended  
 12 by that. Because I didn't want my grandbabies  
 13 to be exposed to the wind or the air, the cool  
 14 air that was up.  
 15 Q Demonstrate for me how Yolanda pushed through  
 16 the door.  
 17 A Okay. Do I need to take this off.  
 18 Q Yes.  
 19 A Well, when -- like she said, the children were  
 20 in their pajamas, we were excited it was  
 21 snowing, and I was getting my camera ready for  
 22 us to take -- go and take pictures and  
 23 everything. And then we were going to work --  
 24 we were working on some Christmas stuff for the  
 25 homeless people. And she stood at the door --

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1 recording --  
 2 A Nope.  
 3 Q -- for that time at your house.  
 4 A Nope, nope. I sure don't. I sure would like to  
 5 know what time the recording was -- when did it  
 6 start? Was it from the very first time she came  
 7 in the door to when she left? That sure would  
 8 be nice.  
 9 Q In your complaint you cite from Ms. Alpough's  
 10 report. It says Ms. Theresa Allen was aware  
 11 that I would be arriving at 10:00 a.m. Is that  
 12 right?  
 13 A Who said that?  
 14 Q It's in your complaint.  
 15 A Do I have a copy of that, whatever you're  
 16 looking at? Can I have a copy of that, because  
 17 I think the last one we got was 7.  
 18 Q I don't have a copy to give you.  
 19 A Well, could I see yours?  
 20 Q I'm not making it an exhibit. It's just the  
 21 complaint that you filed in this lawsuit, ma'am.  
 22 A Well, may I look at it and see?  
 23 Q You may. So my question is just specifically  
 24 you were aware that she would be arriving at  
 25 10:00 a.m., right?

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1 do I get up and do this?  
 2 Q You can.  
 3 A She stood at the door and I can't remember. I  
 4 think she was standing here. And I can't  
 5 remember if -- I just remember her, and I smiled  
 6 and I cracked the door and I was pushing the  
 7 children back and when I looked back at the door  
 8 like this and she pushed like this. And I'm,  
 9 like -- and I had the phone in my hand. So she  
 10 pushed the door -- this is the door.  
 11 Q Which side does the door open?  
 12 A It opens like this. This is the door. She was  
 13 standing here. I had about this much cracked  
 14 because I was holding the phone with this hand.  
 15 I did like this -- wait, no. Let's see. I told  
 16 Ms. Faye, I said, "Hold on." I said,  
 17 "Somebody's knocking at the door and I think  
 18 it's those people. And Katelynn and Elisha,  
 19 they're really little. They ran really fast.  
 20 My foot is here in front of the door. I opened  
 21 the door like this, about this wide, I look out  
 22 and I smile. I turn like this to remove  
 23 Katelynn and Elisha out of the way and she  
 24 pushes the door. And she came in like this and  
 25 she moseyed on over to my sofa. And I said to

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